

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA

V.

1:17CR-00224-AT-CMS

ALLAN PENDERGRASS

MOTION TO TIME TO REVIEW DISCOVERY AND PERFECT MOTIONS

Comes now Defendant, by and through counsel and respectfully moves that he be allowed to perfect any motions contemporaneously filed with this Motion as well as other motions that may arise for the reasons below:

1.

Discovery in this matter is voluminous with thousands of pages of correspondence and bank and checking records having been served on the Defendant. Although they are actually well organized it will still take time to review them all.

2.

Some file types cannot be opened at present. Counsel hopes to solve this problem after consultation with the Government.

WHEREFORE, Defendant prays;

1. That any additional motions be allowed to be filed as of September 26, 2017 as well as the same amount of time be permitted to amend said motions andk
2. For such other relief that this Court deems appropriate.

Respectfully submitted,

S/Robert H. Citronberg

Robert H. Citronberg
Attorney for Defendant(CJA)
State Bar #126275

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CERTIFICATE OF SERVICE

It is hereby certified that the foregoing motion was served electronically on:

Mr. Jeff Brown
Assistant United States Attorney
75 Spring St., SW
Atlanta, Ga. 30303.

This 24th day of August, 2017

S/Robert H. Citronberg

Robert H. Citronberg (CJA)
Attorney for Defendant

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